

**IN THE UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

L. LOUISE LUCAS,

Plaintiff,

v.

CIVIL ACTION NO. 2:21 -cv- 665

**ANGELA GREENE and
KEVIN McGEE,**

Defendants.

NOTICE OF REMOVAL

COMES NOW defendant Angela Greene (“Greene”), by counsel, pursuant to 28 U.S.C. §§1441 and 1446, and gives notice of her removal of an action from the Circuit Court for the City of Portsmouth to this Court, and states the following:

1. That on June 28, 2021, an action was filed in the Circuit Court for the City of Portsmouth styled, *L. Louise Lucas v. Angela Greene and Kevin McGee*, Case No. CL21-2905.
2. Process in the action was served on Greene on November 22, 2021.
3. A copy of the process served on Greene, which is the summons, complaint, and exhibits to the complaint, is attached hereto as Exhibit 1.
4. The Circuit Court for the City of Portsmouth is located within the territorial jurisdiction of the United States District Court for the Eastern District of Virginia, Norfolk Division.
5. The complaint filed in the Circuit Court for the City of Portsmouth purports to state claims against Greene arising under federal law pursuant to 42 U.S.C. §1983 for violation of plaintiff’s constitutional rights, and in particular the violation of plaintiff’s rights under the

Fourth Amendment to the United States Constitution while defendant was acting under color of state law. See, *Exhibit 1, Complaint at ¶¶ 64, 65, 78, 79.*

6. The jurisdiction of this Court over plaintiff's constitutional claims is established under 28 U.S.C. §§1331, 1343, 1441, and 42 U.S.C. §1983.

7. This Court has supplemental jurisdiction over plaintiff's state law claims under 28 U.S.C. § 1367.

8. Venue is proper in the Norfolk Division of this District pursuant to 28 U.S.C. §1391(b)(2).

9. Greene expects to file her responsive pleadings within the time provided by Fed.R.Civ.Proc. 81(c)(2)(C).

10. Greene's counsel has conferred with counsel for defendant Kevin McGee who has not been served with process. Both Greene and McGee unambiguously join in, consent to, and agree to the removal of this action.

WHEREFORE, defendant Angela Greene invokes the jurisdiction of this Court and gives notice to plaintiff of the removal and that plaintiff should govern herself accordingly.

ANGELA GREENE

/s/

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Virginia State Bar No. 26710
Attorney for Angela Greene
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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December, 2021, I will electronically file the

foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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